

U.S. Department of Justice

United States Attorney  
Southern District of New York



The Jacob K. Javits Federal Building  
26 Federal Plaza, 37th Floor  
New York, New York 10278

MEMO ENDORSED

May 24, 2024

BY ECF

Hon. Lewis A. Kaplan  
United States District Judge  
Southern District of New York  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl Street  
New York, NY 10007

Re: *United States v. Heber et al.*, 24 Cr. 188 (LAK)

Dear Judge Kaplan:

The Government respectfully writes, on consent, to request an adjournment of the status conference scheduled for Wednesday, May 29, 2024. The Government is actively discussing a potential resolution with each charged defendant, but does not anticipate completing these discussions until after the scheduled status conference date. Accordingly, the Government respectfully requests an adjournment of approximately two weeks. The defendants consent.

Should the Court grant the requested adjournment, the Government also moves, pursuant to the Speedy Trial Act, 18 U.S.C. § 3161(h)(7)(A), for the exclusion of time until the rescheduled court conference to permit the parties time to discuss a pretrial resolution, to permit the defense time to review discovery and consider whether to file motions, and to permit the Government time to continue its review of the evidence and its production of additional discovery. The defendants consent.

Respectfully submitted,

DAMIAN WILLIAMS  
United States Attorney

by: /s/ James Mandilk  
Assistant United States Attorney  
(212) 637-2453

cc: Counsel of record (via ECF)

GRANTED. Adjourned until 6/18/2024 at 9:30 a.m. Time excluded to and including 6/18/2024. Court finds that the adjournment serves the interests of justice stated above and outweighs the interests of the def. and the public in speedy trial.

SO ORDERED